

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re

HOUSTON REGIONAL SPORTS
NETWORK, L.P.

Debtor.

Chapter 11

Case No. 13-35998

**EMERGENCY MOTION FOR LEAVE TO FILE UNDER SEAL THE OBJECTION OF
THE ROCKETS AND THE ASTROS TO COMCAST’S EMERGENCY MOTION
FOR AN ORDER PROTECTING THE COMCAST-APPOINTED DIRECTORS OF
THE DEBTOR’S GENERAL PARTNER**

**TO THE HONORABLE MARVIN P. ISGUR,
UNITED STATES BANKRUPTCY JUDGE:**

Rocket Ball, Ltd., Rockets Partner, L.P., and JTA Sports, Inc. (collectively, the “**Rockets**”) and Houston Astros, LLC, Astros HRSN GP Holdings LLC, and Astros HRSN LP Holdings LLC (collectively, the “**Astros**,” and together with the Rockets, the “**Teams**”) hereby file this emergency motion (the “**Motion**”) seeking leave of the Court, pursuant to section 107(b) of the Bankruptcy Code and Rule 9018 of the Federal Rules of Bankruptcy Procedure, to file under seal the *Objection of the Rockets and the Astros to Comcast’s Emergency Motion for an Order Protecting the Comcast-Appointed Directors of the Debtor’s General Partner* (the “**Teams’ Objection**”). In support of the Motion, the Teams respectfully states as follows:

BACKGROUND

1. On July 2, 2014, the Court held a status conference (the “**Hearing**”) to discuss, among other things, the status of the Debtors’ reorganization efforts. Portion of the Hearing were closed to the public, and the transcript was maintained under seal.

2. On July 28, 2014, Comcast filed an emergency motion to file under seal [ECF No. 456] (the “**Comcast Sealing Motion**”), in which it sought authorization to file under seal its

Emergency Motion For An Order Protecting The Comcast-Appointed Directors Of The Debtor's General Partner From The Teams' And Potential Purchaser's Abuse Of Bankruptcy Process In View Of Directors' Fiduciary Roles (the “**Comcast Disclosure Motion**”). The Sealing Motion explained that the Comcast Disclosure Motion “discusses and relates directly to the Hearing, and which cites and quotes the Hearing transcript in multiple instances.”

3. The Court has entered an order granting the Sealing Motion [ECF No. 458].

RELIEF REQUESTED

4. By this Motion, the Teams request entry of an order authorizing, pursuant to section 107(b) of the Bankruptcy Code and Rule 9018 of the Federal Rules of Bankruptcy Procedure, the filing of the Teams' Objection under seal.

BASIS FOR RELIEF

5. Section 107(b) of the Bankruptcy Code provides that “[o]n request of a party in interest, the bankruptcy court shall . . . protect an entity with respect to a trade secret or confidential research, development, or commercial information.” 11 U.S.C. § 107(b). In addition, Rule 9018 of the Federal Rules of Bankruptcy Procedures provides that “[o]n motion or on its own initiative, with or without notice, the court may make any order which justice requires . . . to protect the estate or any entity in respect of a trade secret or other confidential research, development or commercial information.” Fed. R. Bankr. P. 9018(1). These provisions are “designed to protect ‘business entities from disclosure of information that could reasonably be expected to cause the entity commercial injury.’” See In re Northstar Energy, Inc., 315 B.R. 425, 429 (Bankr. E.D. Tex. 2004) (citing In re Global Crossing, Ltd., 295 B.R. 720, 725 (Bankr. S.D.N.Y. 2003)).

6. Because the Teams wish to respond to the sealed Comcast Disclosure Motion, the Teams' Objection might be considered to contain commercially sensitive information, the

disclosure of which would be harmful to the business of and to the reorganization efforts of the Debtor. Moreover, no party in interest would be prejudiced if the relief requested were granted. Accordingly, the Teams respectfully request that the Court grant the requested relief.

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CONCLUSION

For the foregoing reasons, the Teams respectfully request that the Court enter an order in the form attached hereto as Exhibit A authorizing the filing of the Teams' Objection under seal and granting such other relief that the Court may deem appropriate.

Dated: July 28, 2014
New York, New York

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CERTIFICATE OF SERVICE

On the date hereof, I, Alan S. Gover, caused the foregoing document to be filed through the Court's CM/ECF filing system. As a result of such filing, a "Notice of Electronic Filing" or "Daily Summary Report of Bankruptcy Filings" was sent to the following persons:

On Behalf of the Network:

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On Behalf of the Astros Entities:

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On Behalf of the Comcast Petitioning Creditors:

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On Behalf of the United States Trustee:

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On Behalf of Interested Party Office of the Commissioner of Baseball:

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On Behalf of Interested Party Dynamo Soccer, LLC:

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On Behalf of Interested Party Fox Cable Network Services, LLC:

Paul J. Laurin: plaurin@btlaw.com

Dated: July 28, 2014

/s/ Alan Shore Gover

Alan Shore Gover